



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AE  
F. #2023R00063

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 13, 2023

By ECF

The Honorable Hector Gonzalez  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Chi Kwan Wong,  
Criminal Docket No. 23-088 (HG)

Dear Judge Gonzalez:

The government moves the Court to enter the attached proposed protective order pursuant to Federal Rule of Criminal Procedure 16(d). Upon request, the government will provide discovery to the defendant pursuant to Federal Rule of Criminal Procedure 16. The discovery materials in this matter include voluminous records containing individually identifiable health information (defined as health information that is connected to a patient's name, address, Social Security Number or other identifying number, including Medicare HIC number) and financial information entitled to be kept confidential. The proposed order will expedite the flow of discovery and ensure that individually identifiable health and financial information is adequately protected.

Counsel for the defendant has consented to the entry of the proposed order.

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York

GLENN S. LEON  
Chief  
Fraud Section, Criminal Division  
U.S. Department of Justice

By: /s/ Andrew Estes  
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Enclosures

cc: Clerk of the Court (HG) (by ECF)  
Counsel of Record (by ECF)